



September 3, 2014

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Pipeline and Hazardous Materials Safety Administration

Docket No. PHMSA-2014-0105 (HM-251B)

RIN 2137-AF08

Hazardous Materials: Oil Spill Response Plans for High-Hazard
Flammable Trains

Please accept these comments from the National Emergency Management Association (NEMA) which represents the emergency management directors in the 50 states, District of Columbia and U.S. territories who are responsible to their governors for all hazards emergency preparedness, mitigation response and recovery.

Recommendations:

1. U.S. DOT should develop a standardized template for all states and railroads to use in reporting shipping information pertaining to Bakken Crude. This would serve to alleviate some of the confusion and disagreements between the states and railroads.
2. U.S. DOT should work with railroads and other stakeholders to develop a national database for first responders to access and gather intelligence information on commodities, amounts and routes that will affect local communities.
3. U.S. DOT should work with railroads, the U.S. Fire Administration and fire service organizations toward developing a standardized curriculum for responding to railroad emergencies for the Bakken Crude. This will ensure that firefighters are equally trained in the event of an incident involving more than one state.
4. Ensure that the Hazardous Materials Emergency Preparedness (HMEP) Grant Program allows grants dollars to be used to fund regional and interagency drills for rail safety response.
5. Consider revisiting some of the railroads federal exemptions.



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